UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

EC-1

EPA expressed concerns that the preferred alternative, which includes the use of pesticides, could pose harm to wildlife unless mitigation measures & pest damage thresholds are carefully followed. EPA suggests that brush hogging operations be limited in the vicinity of the tortoise colonies.

JAN 20 1995

eps/AML

Kenneth R. Johnson
USDA Forest Service
National Forests in Mississippi
100 West Capital Street, Suite 1141
Jackson, Mississippi 39269

SUBJECT: Pest Management for G.F. Erambert and Black Creek Seed Orchards Draft Environmental Impact Statement, Forrest and Perry Counties, Mississippi

Dear Mr. Johnson:

The U.S. Environmental Protection Agency has reviewed the above referenced document in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act. The document presents five alternatives and associated impacts for pest management programs at two nurseries located near Brooklyn, Mississippi. Four action alternatives utilizing combinations of chemical, biological and cultural controls were evaluated. The preferred alternative, integrated pest management that includes all available methods of pest control, is currently used at the two nurseries.

Our review of the document found that the potential impacts to the human and natural environment have been adequately evaluated. The application of chemical pest controls is the one activity that holds the greatest potential for harm. Although we would prefer that chemical pest controls not be utilized at the nurseries, we realize that seed production goals may not be met without their use. To minimize any negative effects associated with chemical pesticide, the integrated pest management program must be used within the context of a decision making process that includes emphasis on pest damage threshholds and mitigating measures to prevent, reduce or compensate for harm to the environment. Additional comments are appended.

We rate this document EC-1. We have environmental concerns in that the preferred alternative may result in some impacts that should be avoided to fully protect the environment. Information in the document is adequate to analyze potential impacts.

Sincerely,

Heinz Mueller

Heinz J. Mueller, Chief
Environmental Policy Section
Federal Activities Branch

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ADDITIONAL COMMENTS

- The last paragraph on page 3-10 relates to the use of *Phlebia gigantea* as a biological control agent to inhibit the infection of freshly cut pine stumps by the pathogenic fungus *Heterbasidion annosum*. The Code of Federal Regulations (CFR) at 40 CFR 152.20(a)(3) states "The following biological control agents are not exempt from FIFRA (Federal Insecticide, Fungicide and Rodenticide Act) requirements: (i) Eucaryotic microorganisms, including protozoa, algae and fungi;..."

  Communication with John Taylor, entomologist and pesticide coordinator, Forest Health, USDA Forest Service, Southern Region, Atlanta, GA. revealed a letter to Philip L. Thornton, USDA Forest Service, Washington, D.C. from John B. Ritch, Jr., Director, Registration Division dated April 30, 1976 exempted the fungus, *Peniophora gigantea*, from registration. Additional telephone communications with Phil Hutton, Biopesticides and Pollution Prevention Division by Robert G. Stryker with the EPA Region IV Pesticide Unit, revealed this biological pesticide would now be required to have registration. This information was communicated by Mr. Stryker to Mr. Taylor for his information.

- In the footnote to the table on page 3-17, the last sentence makes reference to the control of thrips, sawflies and May beetles with malathion. Malathion is not mentioned as a control agent anywhere else in the report. The sentence should be examined for accuracy.

- A typographical error was noted on page 3-33. The biological evaluation referenced in the last sentence on that page is in Appendix D, not Appendix E.

- A number of steps to protect gopher tortoises living in the orchards were presented in the document. Consideration should also be given to limiting bush hogging operations in the vicinity of the tortoise colonies to times when the tortoises are inactive and not likely to be foraging (ie., winter and early spring). This should reduce injuries and death from heavy equipment activity.